

OU15 Meeting Summary

Meeting Location, Date and Time:

EPA Region VIII Headquarters, Denver, CO, Antelope Room
October 13, 1994
8:30 AM - 11:00 AM

Meeting Attendees:

Cathy Alstatt (CDPHE)
Jerry Anderson (EG&G)
Arturo Duran (EPA)
William Fitch (DOE)
John Haasbeek (ERM-PMC)

Roland Hea (ERM-RM)
Dick Hyland (RTG/DOE)
Rich Ray (EG&G)
Dennis Schubbe (EG&G)
Carl Spreng (CDPHE)

Meeting Summary:

Meeting commenced at 8:30 AM.

William Fitch explained that the purpose of the meeting was to present the sampling methods and results for radionuclides and the screening process that was used to evaluate the results. He added that the screening approach was conservative in nature. William Fitch also stated that due to logistical reasons, sampling had been performed concurrently for the IHSS, perimeter and pathway areas, instead of in the phased manner detailed in the Work Plan.

Arturo Duran said that he did not have a problem with the approach that was used, but that he did have questions regarding the sampling results. He raised concerns about some of the QA/QC samples. He also questioned how rinsate concentrations and smear activity levels could be correlated to surface contamination levels. Arturo Duran stated that the bottom line was that DOE needed to demonstrate that there was nothing in the IHSSs, and if the rinsate data could not provide this then it was not acceptable. He also asked about the insoluble components not measured by the dissolved analysis for radionuclides and metals. He added that he was also interested in understanding how concentrations of radionuclides were converted into dose.

Dennis Schubbe presented a brief history of OU15, and described the requirements specified in the Work Plan. He described in the detail the reasons why the sampling methods, in particular the hot water rinsate sampling, were selected, and how verification sampling was performed for the IHSS areas. Arturo Duran questioned why the perimeter and pathway areas were not sampled during the verification process. William Fitch explained that according to the logic presented in the Work Plan, only the IHSS areas should have been sampled in the first place.

Arturo Duran stated that for a RCRA unit, focusing only on the IHSS area was acceptable, but under CERCLA this wasn't necessarily the case. He asked what could be accomplished with the information available.

Dennis Schubbe explained that the situations in the buildings were analogous to operations at a hazardous waste site. The Original Uranium Chip Roaster was akin to an exclusion area, and the Radiologically Controlled Areas were similar to a contamination reduction zone. He added that on-going building operations would likely impact any actions taken to cleanup areas outside the actual IHSS. Within this context, William Fitch also brought up the issue of the beryllium levels measured in the perimeter/pathway areas for IHSSs 179 and 180. He added that the results were being compared to an EG&G internal surface concentration limit, not to an airborne concentration standard.

Arturo Duran asked how many of the IHSSs potentially had radiological contamination that was fixed under the paint. Dennis Schubbe stated that based on existing information, no areas had been painted over to contain radiological contamination. Jerry Anderson added that as far as he knew painting over contamination was not done in the 400 and 800 Areas. Rich Ray stated that typically concrete floors were painted during construction (prior to operations in the area), thereby eliminating the possibility of having contamination in or on the concrete.

Roland Hea presented the results of the radiological smear sampling, dose-rate surveys and hot water rinsate sampling for radionuclides. Dennis Schubbe said that the radiological contamination associated with the Original Uranium Chip Roaster presents the most significant concern for OU15. Jerry Anderson added that the Chip Roaster was the only OU15 IHSS that was an actual source of contamination. For the purposes of comparison in evaluating rinsate concentrations, Jerry Anderson stated that the gross alpha standard for drinking water was 15 pCi/L.

Arturo Duran said that he had questions regarding the evaluation of RCRA constituents. He asked about the levels detected in the QA/QC samples and how these related to the explanations provided in the Draft RFI/RI Report for blank and cross-contamination. John Haasbeek described the types of QA/QC samples collected as part of the RFI/RI, specifically the source water samples, equipment decon blanks and the hot water rinsate sampling equipment blanks. Dennis Schubbe added that the hazardous constituents that were detected in the samples, such as phthalates, had not been managed as wastes in the IHSSs. Arturo Duran said that he had questions about the data validation in the Draft RFI/RI Report because in several instances concentrations of certain constituents were higher in the blank samples than in the real samples.

Arturo Duran suggested that the RFI/RI Report could be streamlined to only include a discussion of specific COCs related to operations of the unit, and that COC list could be screened using process knowledge. Dennis Schubbe said that this could be difficult in areas where COCs had been identified in a generic fashion such as "solvents."

William Fitch asked Arturo Duran if he planned to make this suggestion through formal EPA comments. Arturo Duran said that EPA would provide comments by the end of the following week, and that he would review Section 4.0 (Data Quality Evaluation) in greater detail.

John Haasbeek explained how the screening of radiological data was accomplished for the Draft RFI/RI Report. Cathy Alstatt asked if the screening had been performed based on standards for workers. John Haasbeek replied that it had. Arturo Duran stated that he would need to go back and look at the standards that were used. John Haasbeek explained the application of the GENII code for calculating doses. He added that the fate and transport components of the code had not been used. John Haasbeek went on to reiterate that the screening approach used was built on very conservative assumptions.

Arturo Duran expressed his appreciation for everyone's time in preparing for and attending the meeting. He stated that he would go back and review the Draft RFI/RI Report and provide comments by the end of the following week. Dennis Schubbe said that it would be a good idea to continue to meet on a regular basis. William Fitch expressed his desire to keep the original milestone date (January 4, 1995) for the Final RFI/RI Report.

Meeting adjourned at 11:00 AM.